

The Honorable Lauren King  
Magistrate Theresa L. Fricke

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

SABRINA MARIE KENDALL,  
  
Plaintiff,  
  
v.  
  
WASHINGTON DEPARTMENT OF  
CORRECTIONS, et. al.,  
  
Defendants.

NO. 3:21-cv-05502-LK-TLF

DECLARATION OF MARK RACHEL  
IN SUPPORT OF STATE  
DEFENDANTS' RESPONSE TO  
PLAINTIFF'S MOTION FOR  
EXTENSION TO ANSWER  
INTERROGATORIES

I, Mark J. Rachel, declare under penalty of perjury under the laws of the State of Washington that the following is true and accurate:

1. I am over the age of 18, competent to testify as to the matters stated herein, and make this declaration based on my personal knowledge. I am an Assistant Attorney General assigned to represent the Washington State Department of Corrections, Stephen Sinclair, Deborah "Jo" Wofford, Lisa Anderson-Longano, MD, and Paul Clark (collectively "State Defendants") in this litigation.

2. On 14 April 2022, on behalf of State Defendants, I caused to be served by first-class mail, postage prepaid, Defendants' [sic] First Interrogatories and Requests for Production to Sabrina Marie Kendall, containing discovery requests pursuant to FRCP 26, 33, and 34, i.e. interrogatories and requests for production of documents.

DECLARATION OF MARK RACHEL  
ISO OF STATE DEFENDANTS'  
RESPONSE TO PLAINTIFF'S MOTION  
FOR EXTENSION TO ANSWER  
INTERROGATORIES  
NO. 3:21-cv-05502-LK-TLF

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OFFICE OF THE ATTORNEY GENERAL  
1250 Pacific Avenue, Suite 105  
P.O. Box 2317  
Tacoma, WA 98401  
(253) 593-5243

3. On 16 May 2022, I deposed the Plaintiff in this matter, Sabrina Marie Kendall. During off-record discussions, Ms. Kendall raised the topic of her letter filed on 9 May 2022 in this case at Dkt. 27, and acknowledged that she was referencing therein State Defendants' written discovery described above.

4. Ms. Kendall wanted to confirm that I understood her filing as requesting an additional 90 days to respond to the written discovery which State Defendants had served upon her, and the basis for her requesting such relief as reflected in her letter.

5. In the ensuing discussion, I confirmed the same and explained that State Defendants would be responding that they do not oppose her request for additional time, so long as the discovery cutoff and all associated pretrial deadlines are likewise extended. My perception was that Ms. Kendall acknowledged understanding that intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

DATED this 17th day of May, 2022.

ROBERT W. FERGUSON  
Attorney General

s/ Mark Rachel  
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Attorney for State Defendants

**DECLARATION OF SERVICE**

I declare that on this 17th day of May, 2022, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Sabrina M. Kendall, DOC #729655  
Washington Corrections Center for Women  
9601 Bujacich Rd NW  
Gig Harbor, WA 98322  
[DOCWCCWInmateFederal@DOC1.WA.GOV](mailto:DOCWCCWInmateFederal@DOC1.WA.GOV)

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[lisa@lldkb.com](mailto:lisa@lldkb.com)

DATED this 17th day of May, 2022.

ROBERT W. FERGUSON  
Attorney General

*s/ Mark Rachel*  
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